William L. Pegg, PC BY: William L. Pegg Jr., 5528 133 Washington Street Morristown, NJ 07960 (973) 540-0202 FX: (973) 984-6666

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY

In Re:

Chapter 7

Laurie J. Rieger

Attorney for Debtor

Last four digits of Social Security

Number: 7369

Judge Morris Stern

Debtor,

Case No. 11-38180

NOTICE OF MOTION TO REDEEM PROPERTY

TO: Capital One Auto Finance Post Office Box 260848 Piano, TX 75026-0848

> Charles M. Forman, Trustee Forman, Holt, Eliades & Ravin, LLC 80 Rt. 4 East Paramus, NJ 07652

PLEASE TAKE NOTICE that on January 3rd, 2012 at 12 o'clock in the forenoon, or as soon thereafter as counsel may be heard, the undersigned counsel for the Debtor, Laurie J. Rieger shall apply to Judge Morris Stern, Courtroom 3A, Martin Luther Kind Federal Courthouse, 50 Walnut Street, Newark, New Jersey, 07102, for the entry of an order redeeming a 2003 Jeep Liberty Sport vehicle from the lien of Capital Auto Finance, and for such other relief as is requested in the proposed order or as may be ordered by the court;

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case.

If you do not want the court to grant the relief sought in the in this motion or if you want the court to consider your views on the motion, then on or before December 23^{rd} , 2011 you or your attorney must

File a written response or request for a hearing to: Clerk, US Bankruptcy Court, Martin Luther Kind Federal Courthouse, 50 Walnut Street, Newark NJ, 07192.

If you mail a request or response to the court for filing, you must mail it early enough to the court will receive it on or before the date stated above.

You must also mail a copy to the attorney for the debtor at the address set forth above.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting the relief sought.

Dated: November 29, 2011

/s/ William L. Pegg Jr.

Attorney for the Debtor